

STEPHEN D. HANS & ASSOCIATES, P.C.

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Attorneys for the Defendants,

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Byron Geovanny Arevalo Fajardo, Carlos Martell,
Jose Gutierrez, Juan Pereyra, Inigo Mendoza
Ramirez (a/k/a Eduardo Mendoza Ramirez), Miguel Garrido,
Reymundo Chavez Hernandez (a/k/a Ramon Chavez
Hernandez), Richard Xavier Hernandez, and Sebastian
Alfredo Espinosa Vargas (a/k/a Sebby Espinosa Vargas),
on behalf of themselves and other similarly situated in
the propose FLSA Collective Action,

Case No. 21-cv-05236

Plaintiffs,

-against-

ANSWER

WB Maintenance & Design Group Inc., W.B. &
Son Construction Corp., Wladimir Briceno, Betty
Briceno, Jeissy Briceno, and Jeimy Briceno,

Defendants,

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The Defendants WB MAINTENANCE & DESIGN GROUP INC., WLADIMIR
BRICENO, BETTY BRICENO, JEISSY BRICENO, and JEIMY BRICENO (hereinafter referred
to, collectively, as the “Defendants”), by and through their attorneys, STEPHEN D. HANS AND
ASSOCIATES, P.C., as and for their Answer to the Plaintiff’s Complaint filed on September 20,
2021 (hereinafter the “Complaint”), respond as follows:

AS AND FOR AN ANSWER TO PLAINTIFF'S
"NATURE OF THE ACTION"

1. With respect to the allegations contained in Paragraph 1 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
2. With respect to the allegations contained in Paragraph 2 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"JURISDICTION AND VENUE"

3. With respect to the allegations contained in Paragraph 3 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
4. With respect to the allegations contained in Paragraph 4 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
5. With respect to the allegations contained in Paragraph 5 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PARTIES"

6. With respect to the allegations contained in Paragraph 6 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

7. With respect to the allegations contained in Paragraph 7 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
8. With respect to the allegations contained in Paragraph 8 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
9. With respect to the allegations contained in Paragraph 5 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S

"PLAINTIFF CARLOS MARTELL"

10. With respect to the allegations contained in Paragraph 10 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
11. With respect to the allegations contained in Paragraph 11 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
12. With respect to the allegations contained in Paragraph 12 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

13. With respect to the allegations contained in Paragraph 13 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF JOSE GUITERREZ"

14. With respect to the allegations contained in Paragraph 14 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
15. With respect to the allegations contained in Paragraph 15 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
16. With respect to the allegations contained in Paragraph 16 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
17. With respect to the allegations contained in Paragraph 17 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF JUAN PEREYRA"

18. With respect to the allegations contained in Paragraph 18 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
19. With respect to the allegations contained in Paragraph 19 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
20. With respect to the allegations contained in Paragraph 20 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
21. With respect to the allegations contained in Paragraph 21 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF INIGO MENDOZA RAMIREZ (A/K/A EDUARDO MENDOZA
RAMIEREZ"

22. With respect to the allegations contained in Paragraph 22 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
23. With respect to the allegations contained in Paragraph 23 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

24. With respect to the allegations contained in Paragraph 24 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
25. With respect to the allegations contained in Paragraph 25 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF MIGUEL GARRIDO"

26. With respect to the allegations contained in Paragraph 26 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
27. With respect to the allegations contained in Paragraph 27 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
28. With respect to the allegations contained in Paragraph 28 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
29. With respect to the allegations contained in Paragraph 29 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF REYMUNDO CHAVEZ HERNANDEZ (A/K/A RAMON CHAVEZ
HERNANDEZ)"

30. With respect to the allegations contained in Paragraph 30 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
31. With respect to the allegations contained in Paragraph 31 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
32. With respect to the allegations contained in Paragraph 32 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
33. With respect to the allegations contained in Paragraph 33 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF RICHARD XAVIER HERNANDEZ"

34. With respect to the allegations contained in Paragraph 34 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
35. With respect to the allegations contained in Paragraph 35 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

36. With respect to the allegations contained in Paragraph 36 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
37. With respect to the allegations contained in Paragraph 37 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

**AS AND FOR AN ANSWER TO PLAINTIFF'S
"PLAINTIFF RICHARD XAVIER HERNANDEZ"**

38. With respect to the allegations contained in Paragraph 38 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
39. With respect to the allegations contained in Paragraph 39 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
40. With respect to the allegations contained in Paragraph 40 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
41. With respect to the allegations contained in Paragraph 41 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT WB MAINTENANCE & DESIGN GROUP INC."

42. With respect to the allegations contained in Paragraph 42 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
43. With respect to the allegations contained in Paragraph 43 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
44. With respect to the allegations contained in Paragraph 44 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
45. With respect to the allegations contained in Paragraph 45 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT W.B. & SON CONSTRUCTION CORP."

46. With respect to the allegations contained in Paragraph 46 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
47. With respect to the allegations contained in Paragraph 47 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

48. With respect to the allegations contained in Paragraph 48 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
49. With respect to the allegations contained in Paragraph 49 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT VLADIMIR BRICENO"

50. With respect to the allegations contained in Paragraph 50 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
51. With respect to the allegations contained in Paragraph 51 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
52. With respect to the allegations contained in Paragraph 52 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
53. With respect to the allegations contained in Paragraph 53 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
54. With respect to the allegations contained in Paragraph 54 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT BETTY BRICENO"

55. With respect to the allegations contained in Paragraph 55 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
56. With respect to the allegations contained in Paragraph 56 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
57. With respect to the allegations contained in Paragraph 57 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
58. With respect to the allegations contained in Paragraph 58 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
59. With respect to the allegations contained in Paragraph 59 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT BETTY BRICENO"

60. With respect to the allegations contained in Paragraph 60 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
61. With respect to the allegations contained in Paragraph 61 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
62. With respect to the allegations contained in Paragraph 62 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
63. With respect to the allegations contained in Paragraph 63 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

64. With respect to the allegations contained in Paragraph 64 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT JEIMY BRICENO"

65. With respect to the allegations contained in Paragraph 65 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

66. With respect to the allegations contained in Paragraph 66 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

67. With respect to the allegations contained in Paragraph 67 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

68. With respect to the allegations contained in Paragraph 68 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

69. With respect to the allegations contained in Paragraph 69 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"DEFENDANT CONSTITUTE JOINT EMPLOYERS"

70. With respect to the allegations contained in Paragraph 70 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
71. With respect to the allegations contained in Paragraph 71 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
72. With respect to the allegations contained in Paragraph 72 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
73. With respect to the allegations contained in Paragraph 73 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
74. With respect to the allegations contained in Paragraph 74 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
75. With respect to the allegations contained in Paragraph 75 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
76. With respect to the allegations contained in Paragraph 76 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
 - a. With respect to the allegations contained in Paragraph 76(a) of the Complaint, the Defendants deny the allegations contained in such Paragraph.
 - b. With respect to the allegations contained in Paragraph 76(b) of the Complaint, the Defendants deny the allegations contained in such Paragraph.
 - c. With respect to the allegations contained in Paragraph 76(c) of the Complaint, the Defendants deny the allegations contained in such Paragraph.

- d. With respect to the allegations contained in Paragraph 76(d) of the Complaint, the Defendants deny the allegations contained in such Paragraph.
- e. With respect to the allegations contained in Paragraph 76(e) of the Complaint, the Defendants deny the allegations contained in such Paragraph.
- f. With respect to the allegations contained in Paragraph 76(f) of the Complaint, the Defendants deny the allegations contained in such Paragraph.
- g. With respect to the allegations contained in Paragraph 76(g) of the Complaint, the Defendants deny the allegations contained in such Paragraph.
- h. With respect to the allegations contained in Paragraph 76(h) of the Complaint, the Defendants deny the allegations contained in such Paragraph.

77. With respect to the allegations contained in Paragraph 77 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

78. With respect to the allegations contained in Paragraph 78 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"FACTUAL ALLEGATIONS"

79. With respect to the allegations contained in Paragraph 79 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

80. With respect to the allegations contained in Paragraph 80 of the Complaint, the Defendants admit the allegations contained in such Paragraph.

81. With respect to the allegations contained in Paragraph 81 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

82. With respect to the allegations contained in Paragraph 82 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
83. With respect to the allegations contained in Paragraph 83 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
84. With respect to the allegations contained in Paragraph 84 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
85. With respect to the allegations contained in Paragraph 85 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
86. With respect to the allegations contained in Paragraph 86 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
87. With respect to the allegations contained in Paragraph 87 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
88. With respect to the allegations contained in Paragraph 88 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
89. With respect to the allegations contained in Paragraph 89 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
90. With respect to the allegations contained in Paragraph 90 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
91. With respect to the allegations contained in Paragraph 91 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

92. With respect to the allegations contained in Paragraph 92 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
93. With respect to the allegations contained in Paragraph 93 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
94. With respect to the allegations contained in Paragraph 94 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
95. With respect to the allegations contained in Paragraph 95 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
96. With respect to the allegations contained in Paragraph 96 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
97. With respect to the allegations contained in Paragraph 97 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
98. With respect to the allegations contained in Paragraph 98 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
99. With respect to the allegations contained in Paragraph 99 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
100. With respect to the allegations contained in Paragraph 100 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

101. With respect to the allegations contained in Paragraph 101 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
102. With respect to the allegations contained in Paragraph 102 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
103. With respect to the allegations contained in Paragraph 103 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
104. With respect to the allegations contained in Paragraph 104 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
105. With respect to the allegations contained in Paragraph 105 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
106. With respect to the allegations contained in Paragraph 106 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
107. With respect to the allegations contained in Paragraph 107 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
108. With respect to the allegations contained in Paragraph 108 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
109. With respect to the allegations contained in Paragraph 109 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
110. With respect to the allegations contained in Paragraph 110 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

111. With respect to the allegations contained in Paragraph 111 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
112. With respect to the allegations contained in Paragraph 112 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
113. With respect to the allegations contained in Paragraph 113 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
114. With respect to the allegations contained in Paragraph 114 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
115. With respect to the allegations contained in Paragraph 115 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
116. With respect to the allegations contained in Paragraph 116 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
117. With respect to the allegations contained in Paragraph 117 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
118. With respect to the allegations contained in Paragraph 118 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
119. With respect to the allegations contained in Paragraph 119 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
120. With respect to the allegations contained in Paragraph 120 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

121. With respect to the allegations contained in Paragraph 121 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
122. With respect to the allegations contained in Paragraph 122 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
123. With respect to the allegations contained in Paragraph 123 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
124. With respect to the allegations contained in Paragraph 124 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
125. With respect to the allegations contained in Paragraph 125 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
126. With respect to the allegations contained in Paragraph 126 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
127. With respect to the allegations contained in Paragraph 127 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
128. With respect to the allegations contained in Paragraph 128 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
129. With respect to the allegations contained in Paragraph 129 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
130. With respect to the allegations contained in Paragraph 130 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

131. With respect to the allegations contained in Paragraph 131 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
132. With respect to the allegations contained in Paragraph 132 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
133. With respect to the allegations contained in Paragraph 133 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
134. With respect to the allegations contained in Paragraph 134 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
135. With respect to the allegations contained in Paragraph 135 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
136. With respect to the allegations contained in Paragraph 136 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
137. With respect to the allegations contained in Paragraph 137 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
138. With respect to the allegations contained in Paragraph 138 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
139. With respect to the allegations contained in Paragraph 139 of the Complaint, the Defendants admit the allegations contained in such Paragraph.

140. With respect to the allegations contained in Paragraph 140 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
141. With respect to the allegations contained in Paragraph 141 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
142. With respect to the allegations contained in Paragraph 142 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
143. With respect to the allegations contained in Paragraph 143 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
144. With respect to the allegations contained in Paragraph 144 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
145. With respect to the allegations contained in Paragraph 145 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
146. With respect to the allegations contained in Paragraph 146 of the Complaint, the Defendants admit the allegations contained in such Paragraph.
147. With respect to the allegations contained in Paragraph 147 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
148. With respect to the allegations contained in Paragraph 148 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

149. With respect to the allegations contained in Paragraph 149 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
150. With respect to the allegations contained in Paragraph 150 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
151. With respect to the allegations contained in Paragraph 151 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
152. With respect to the allegations contained in Paragraph 152 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
153. With respect to the allegations contained in Paragraph 153 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
154. With respect to the allegations contained in Paragraph 154 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
155. With respect to the allegations contained in Paragraph 155 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
156. With respect to the allegations contained in Paragraph 156 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
157. With respect to the allegations contained in Paragraph 157 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
158. With respect to the allegations contained in Paragraph 158 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

159. With respect to the allegations contained in Paragraph 159 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
160. With respect to the allegations contained in Paragraph 160 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
161. With respect to the allegations contained in Paragraph 161 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
162. With respect to the allegations contained in Paragraph 162 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

**AS AND FOR AN ANSWER TO PLAINTIFF'S
"FLSA COLLECTIVE ACTION ALLEGATIONS"**

163. With respect to the allegations contained in Paragraph 163 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
164. With respect to the allegations contained in Paragraph 164 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
165. With respect to the allegations contained in Paragraph 165 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

166. With respect to the allegations contained in Paragraph 166 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"FIRST CLAIM"
(FLSA – Unpaid Minimum Wages, 29 U.S.C. § 201 et seq.)

167. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein

168. With respect to the allegations contained in Paragraph 168 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

169. With respect to the allegations contained in Paragraph 169 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

170. With respect to the allegations contained in Paragraph 170 of the Complaint, the Defendants deny the allegations contained in such Paragraph

AS AND FOR AN ANSWER TO PLAINTIFF'S
"SECOND CLAIM"
(FLSA – Unpaid Overtime Wages, 29 U.S.C. § 201 et seq.)

171. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.

172. With respect to the allegations contained in Paragraph 172 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
173. With respect to the allegations contained in Paragraph 173 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.
174. With respect to the allegations contained in Paragraph 174 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
175. With respect to the allegations contained in Paragraph 175 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
176. With respect to the allegations contained in Paragraph 176 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"THIRD CLAIM"
(NYLL – *Unpaid Minimum Wages, N.Y. Stat. § 650 et seq.*)

177. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.
178. With respect to the allegations contained in Paragraph 178 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
179. With respect to the allegations contained in Paragraph 179 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

180. With respect to the allegations contained in Paragraph 180 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"FOURTH CLAIM"
(NYLL – Unpaid Overtime Wages)

181. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.

182. With respect to the allegations contained in Paragraph 182 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

183. With respect to the allegations contained in Paragraph 183 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

184. With respect to the allegations contained in Paragraph 184 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

185. With respect to the allegations contained in Paragraph 185 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

186. With respect to the allegations contained in Paragraph 186 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"FIFTH CLAIM"
(NYLL – Spread-of-Hours Pay)

187. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.
188. With respect to the allegations contained in Paragraph 188 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
189. With respect to the allegations contained in Paragraph 189 of the Complaint, the Defendants deny the allegations contained in such Paragraph.
190. With respect to the allegations contained in Paragraph 190 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"SIXTH CLAIM"
(NYLL WPTA – Failure to Provide Wage Notices)

191. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.
192. With respect to the allegations contained in Paragraph 192 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.
193. With respect to the allegations contained in Paragraph 184 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

194. With respect to the allegations contained in Paragraph 194 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"SEVENTH CLAIM"
(Violation of the Wage Statement Provisions of the NYLL)

195. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.

196. With respect to the allegations contained in Paragraph 196 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

197. With respect to the allegations contained in Paragraph 197 of the Complaint, the Defendants deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in such Paragraph.

AS AND FOR AN ANSWER TO PLAINTIFF'S
"EIGHTH CLAIM"
(Failure to Pay Timely Wages)

198. The Defendants repeats and reasserts each and every one of the responses contained in the preceding paragraphs hereof with the same force and effects as though fully set forth herein.

199. With respect to the allegations contained in Paragraph 199 of the Complaint, the Defendants state that such allegations consist of statements and/or conclusions of law and/or statements calling for a legal conclusion, to which no responsive pleading is required.

200. With respect to the allegations contained in Paragraph 200 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

201. With respect to the allegations contained in Paragraph 201 of the Complaint, the Defendants deny the allegations contained in such Paragraph.

RESPONSE TO PLAINTIFFS' PRAYER OF RELEIF

The Defendants, upon information and belief, deny all statements made with respect to Defendants and assert that the Plaintiffs are not entitled to any of the relief form the Defendants as sought in the Plaintiffs' Prayer of Relief, including subparagraphs (a) through (q).

AFFIRMATIVE AND OTHER DEFENSES

The Defendants assert the following affirmative and other defenses without assuming any burden of production or proof that they would not otherwise have. The Defendants further assert that, to the extent that the Plaintiff's claims as alleged are vague or unclear, so as to render it difficult or impossible to identify and assert every possible affirmative or other defense, the Defendants hereby expressly reserve their rights to assert additional defenses should further proceedings in this action, including the progress of any discovery, reveal that such additional defenses would be applicable and appropriate.

FIRST AFFIRMATIVE DEFENSE

The Defendant states, in the alternative, if necessary, that if they are found to have violated any law or regulation, that any such violation was not willful.

SECOND AFFIRMATIVE DEFENSE

At all times relevant hereto, Defendants acted in good faith and did not violate any rights which may be secured to Plaintiff under federal, state or local laws, rules, regulations or guidelines.

RESERVATION OF RIGHTS TO ASSERT ADDITIONAL DEFENSES

The Defendants state that they currently have insufficient knowledge or information on which to form a belief as to whether they may have additional, as yet unstated, defenses available. As such, the Defendants expressly reserve the right to assert additional defenses, and to seek to amend this Answer to include any such additional defenses, in the event discovery indicates that any such additional defenses would be appropriate.

WHEREFORE, the Defendants respectfully request that judgment be entered by this Court dismissing any claims in the Complaint that are deemed by the Court to be lacking in merit, with prejudice, and granting such further relief as may be just and proper.

Dated: Long Island City, New York
November 1, 2021

STEPHEN D. HANS & ASSOCIATES, P.C.

By: _____/s/
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